

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**LA UNION DEL PUEBLO ENTERO, et
al.,**

Plaintiffs,

V.

GREGORY W. ABBOTT, et al.,

Defendants.

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**CIVIL ACTION NO:
5:21-CV-0844-XR**

DEFENDANTS MICHAEL SCARPELLO AND JOHN CREUZOT'S
AMENDED DESIGNATION OF POTENTIAL TESTIFYING EXPERTS

Defendants Michael Scarpello and John Creuzot, by and through their undersigned attorneys,
hereby submit their Amended Designation of Potential Testifying Experts.

I. Potential Testifying Experts

Barbara Nicholas, Attorney Fees Expert
Jason Schuette, Attorney Fees Expert
c/o Dallas County Criminal District Attorney's Office
Civil Division (the undersigned counsel of record)
500 Elm Street, Suite 6300
Dallas, Texas 75202

Ms. Nicholas and Mr. Schuette may present testimony regarding attorneys' fees in this matter. Defendants Scarpello and Creuzot reserve the right to designate and call any expert witnesses identified by Plaintiffs, Co-Defendants, or Intervenors.

The parties have not yet completed discovery in this case. Defendants Scarpello and Creuzot therefore reserve the right to supplement this Designation pursuant to the Court's Scheduling Order and the Federal Rules of Civil Procedure if additional witnesses are identified during discovery.

Respectfully submitted,

**JOHN CREUZOT
DISTRICT ATTORNEY**

/s/ Ben L. Stool
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**ATTORNEYS FOR DEFENDANT MICHAEL
SCARPELLO IN HIS OFFICIAL CAPACITY
AS DALLAS COUNTY ELECTIONS
ADMINISTRATOR AND DEFENDANT JOHN
CREUZOT IN HIS OFFICIAL CAPACITY AS
DALLAS COUNTY DISTRICT ATTORNEY**

CERTIFICATE OF SERVICE

I, hereby certify that the foregoing document was filed electronically on February 3, 2023, with the Clerk of the Court for the Western District of Texas by using the CM/ECF system, causing electronic service upon all counsel of record.

/s/ Ben L. Stool